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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ERIC YOKANI MORENO-OCHOA,

13 Defendant.

14 Case No.: 2:18-cr-00116-JAD-CWH

15 **Joint Stipulation to Continue
Government's Response to
Defendant's Motion to Dismiss
(ECF No. 43) and Defendant's Reply
(Second Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
17 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States
18 Attorney, counsel for the United States of America, and Andrew M. Leavitt, counsel for
19 Eric Yokani Moreno-Ochoa, that the government's response to defendant's motion to
20 dismiss (ECF No. 43) currently due on Friday, July 5, 2019, be vacated and continued to
21 July 12, 2019, with defendant's corresponding reply due on July 19, 2019.

22 This Stipulation is entered into for the following reasons:

23 1. Government counsel continues to need additional time to properly respond
24 to defendant's motion, to include researching the issues raised by the defendant.

1 2. The government is currently attempting to obtain documentation which may
2 be despotic of the case.

3 3. Denial of this request for continuance could result in a miscarriage of
4 justice.

5 4. This is the second request for continuance of the government response to
6 defendant's motion to dismiss.

7

8 DATED this 5th day of July, 2019.

9

10 NICHOLAS A. TRUTANICH
11 United States Attorney

12 By /s/ Andrew M. Leavitt
13 ANDREW M. LEAVITT

14 By /s/ Jared L. Grimmer
15 JARED L. GRIMMER
16 Assistant United States Attorney

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC YOKANI MORENO-OCHOA,

Defendant.

Case No.: 2: 18-cr-00116-JAD-CWH

IT IS THEREFORE ORDERED that the government's response to defendant's motion to dismiss (ECF No. 43) currently due on Friday, July 5, 2019, be vacated and continued to July 12, 2019, with defendant's corresponding reply due on July 19, 2019.

DATED this 10 day of July, 2019.

UNITED STATES MAGISTRATE JUDGE

